

PLEASE TAKE NOTICE that Defendants, Fischer, Porter & Thomas, P.C. and Arthur L. Porter, Jr., Esq., by their attorneys, Graham Curtin, A Professional Association, shall cross-move on February 1, 2016, or as soon thereafter as counsel may be heard, before the Honorable Katharine S. Hayden, U.S.D.J., in United States District Court for the District of New Jersey, for an Order granting Defendants' motion for sanctions pursuant to Fed.R.Civ.P. 11(c)(2).

PLEASE TAKE FURTHER NOTICE that in support of this Cross-Motion, Defendants shall rely upon the Declaration of Christopher J. Carey, Esq. and the memorandum of law submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

GRAHAM CURTIN
A Professional Association
*Attorneys for Defendants,
Fischer, Porter & Thomas, P.C. and
Arthur L. Porter, Jr., Esq.*

Dated: January 19, 2016

/s/ Christopher J. Carey
Christopher J. Carey